

For Six Month Period Ending December 4, 1988  
(Insert date)

Name of Registrant **Arnold & Porter**

Registration No. **1750**

Business Address of Registrant **1200 New Hampshire Avenue, N.W.  
Washington, D.C. 20036**

**I-REGISTRANT**

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual: **N/A**

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1.

**N/A**

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection  
Ended

**G. Philip Nowak, who has previously filed a Short-Form Registration Statement, is not rendering services to any of Registrant's foreign principals. This Short-Form Registration is hereby terminated.**

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?  
 Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
See Attachment No. 1				

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?  
 Yes ☐ No ☒ \*/

If yes, identify each such person and describe his services.

\*/ However, Victor Zonana and Deborah Prutzman, who became partners in earlier periods, began to render services to foreign principals during this period

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
See Attachment No. 2		

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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See Attachment No. 3

## II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

*Name of foreign principal*

*Date of Termination*

See Attachment No. 4

9. Have you acquired any new foreign principal<sup>1</sup> during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

*Name and address of foreign principal*

*Date acquired*

See Attachment No. 5

10. In addition to those named in Items 8 and 9, if any, list the foreign principals<sup>1</sup> whom you continued to represent during the 6 month reporting period.

See Attachment No. 6

## III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

See Attachment No. 7

<sup>1</sup>The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?  
 Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See Attachment No. 8

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

<sup>2</sup>The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

## IV—FINANCIAL INFORMATION

## 14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>3</sup>

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Attachment No. 9

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Total

## (b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>4</sup> other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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<sup>3</sup>A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).  
<sup>4</sup>Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement?      Yes ☒      No ☐

(2) transmitted monies to any such foreign principal?      Yes ☐      No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Attachment No. 10

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Total

**15. (b) DISBURSEMENTS—THINGS OF VALUE**

During this 6 month reporting period, have you disposed of anything of value<sup>5</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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**(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>5</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒ \*/

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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\*/ See Attachment No. 11

**V—POLITICAL PROPAGANDA**

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal. N/A

<sup>5</sup>Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? N/A Yes ☐ No ☐

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

- ☐ Radio or TV broadcasts    ☐ Magazine or newspaper articles    ☐ Motion picture films    ☐ Letters or telegrams  
☐ Advertising campaigns    ☐ Press releases    ☐ Pamphlets or other publications    ☐ Lectures or speeches  
☐ Other (specify) N/A

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

- ☐ Public Officials    ☐ Newspapers    ☐ Libraries  
☐ Legislators    ☐ Editors    ☐ Educational institutions  
☐ Government agencies    ☐ Civic groups or associations    ☐ Nationality groups  
☐ Other (specify) N/A

21. What language was used in this political propaganda:

- ☐ English    ☐ Other (specify) N/A

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? N/A Yes ☐ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐ N/A

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? N/A Yes ☐ No ☐

## VI-EXHIBITS AND ATTACHMENTS

### 25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A<sup>6</sup>    Yes ☒    No ☐  
 Exhibit B<sup>7</sup>    Yes ☒    No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☒ No ☐

If no, please attach the required amendment.

<sup>6</sup>The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

<sup>7</sup>The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.



## 26. EXHIBIT C

If you have previously filed an Exhibit C<sup>8</sup>, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐ N/A

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

## 27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

  
Robert E. Herzstein

Subscribed and sworn to before me at

Washington, D.C.

this 25<sup>th</sup> day of January, 19 89

  
(Signature of notary or other officer)

My Commission Expires February 14, 1991

<sup>8</sup>The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

# ARNOLD & PORTER

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1700 LINCOLN STREET  
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(303) 863-1000

900 THIRD AVENUE  
NEW YORK, NEW YORK 10022  
(212) 593-2772

WILLIAM D. ROGERS  
DIRECT LINE: (202) 872-6915

July 8, 1988

## BY HAND

Mr. R. Richard Newcomb  
Director, Office of Foreign  
Assets Control  
Department of the Treasury  
1331 G Street, N.W., 5th Floor  
Washington, D.C. 20220

Dear Mr. Newcomb:

This is to follow up on conversations of several of my partners with Marilyn Muench and Bill Hoffman of your office on July 1, 6, and 7. Those conversations related to Ambassador Sosa's letters of June 29 to the Federal Reserve Bank of New York, copies of which were hand delivered to you on that day and are attached hereto. In the letters, Ambassador Sosa requested that the Federal Reserve Bank of New York invest funds held in Government of Panama Account Nos. 2 and 3 in safe, high-yield instruments. However, the Office of Foreign Assets Control ("OFAC") has intervened and refused to permit these investments to occur, despite the fact that such investments can only benefit the people of Panama. OFAC has ordered the Federal Reserve Bank of New York not to act on the requests of Ambassador Sosa in his letters of June 29 without OFAC's authorization. OFAC has not provided that authorization.

This is but the latest in a long series of interferences by OFAC with Ambassador Sosa's management of the finances of the recognized Government of Panama. It is in conflict with Executive Order 12635, which by its terms exempts official Government of Panama transactions from OFAC's jurisdiction. It is also in conflict with the respect due from one government to another. There is thus no legal basis or political rationale for OFAC's actions.

We have requested on several occasions written justification for the actions that OFAC has taken with respect to transactions authorized by the recognized

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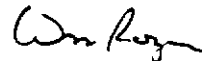
ARNOLD & PORTER

Mr. R. Richard Newcomb  
July 8, 1988  
Page 2

representative of Panama. We have yet to receive from OFAC any written statement which would provide a legal basis under Executive Order 12635 (including Section 3 of that Order) for your interference with Ambassador Sosa's instructions.

The inability of the Federal Reserve Bank of New York to act promptly on Ambassador Sosa's requests has had and continues to have an adverse financial impact on the Government of Panama, because that Government is unable to maximize the return on the funds in Account Nos. 2 and 3. The Government of Panama holds OFAC and the United States Government fully responsible for the continuing adverse financial consequences.

Sincerely,



William D. Rogers

cc: Michael G. Kozak  
Mark Sullivan III

Enclosures

ATTACHMENT NO. 1

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

/XX/ Yes / / No

If yes, furnish the following information:

<u>Name</u>	<u>Residence Address</u>	<u>Citizenship</u>	<u>Position</u>	<u>Date Assumed</u>
Geoffrey Aronow	4508 Yuma Street, N.W. Washington, D.C. 20016	USA	Partner	October 1, 1988
Roger Fendrich	6410 Tone Drive Bethesda, MD 20817	USA	Partner	October 1, 1988
Porfirio Ramirez	16 Meadowbrook Road Short Hills, NJ 07078	USA	Partner	August 15, 1988
Thomas Seawell	4021 So Bellaire Street Englewood, CO 80110	USA	Partner	September 1, 1988
Jeffrey Smith	1617 Greenbrier Court Reston, VA 22090	USA	Partner	September 6, 1988
Ronald Stern	7529 Royal Dominion Drive Bethesda, MD 20817	USA	Partner	October 1, 1988
Jay Wright	1062 Rector Lane McLean, VA 22102	USA	Partner	October 1, 1988

ATTACHMENT NO. 2

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?

/XX/ Yes / / No

If yes, furnish the following information:

<u>Name</u>	<u>Position or Connection</u>	<u>Date Terminated</u>
David Greenberg	Associate	September 30, 1988
Jeffrey Kanne	Associate	July 2, 1988
Hee-Jin Kim	Foreign Associate	September 30, 1988
Kevin Marks	Associate	August 1, 1988
Michael Pearce	Foreign Associate	September 30, 1988
Edward Rosic	Associate	August 12, 1988

In addition, Robert J. McReavy, who has previously filed a Short-Form Registration Statement, will not be rendering services to any of Registrant's foreign principals. This Short-Form Registration is hereby terminated.

Ann Misback (as of September 23, 1988) and Lynda Clarizio (as of October 31, 1988), who had previously filed Short-Form Registration Statements, are on leaves of absence from the Registrant and are currently located outside the United States. These Short-Form Registrations are hereby terminated.

ATTACHMENT NO. 3

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity?

/XX/ Yes / / No

If yes, furnish the following information:

<u>Name</u>	<u>Residence Address</u>	<u>Position or Connection</u>	<u>Date Connection Began</u>
Paul Alpuche	1101 New Hampshire Ave. N.W. No. 718 Washington, D.C. 20036	Associate	September 12, 1988
C. Anthony Friedrich	3110 18th Street, N.W. Washington, D.C. 20010	Associate	September 6, 1988
Michael Stosser	1505 R Street, N.W. Washington, D.C. 20009	Associate	July 5, 1988

In addition, the following persons, hired previously, began to render services to foreign principals during this period:

<u>Name</u>	<u>Residence Address</u>	<u>Position or Connection</u>	<u>Date Connection Began</u>
Michele Brace	2133 Newport Place, N.W. Washington, D.C. 20037	Associate	August 31, 1987
Jonathan Burns	905 North Monroe Street Arlington, Virginia 22201	Associate	October 19, 1987
William Chandler	1815 Palmer Avenue No. 3S Larchmont, New York 10538	Associate	October 13, 1987
Beth Cook	3018 N Street, N.W. Washington, D.C. 20037	Associate	October 19, 1987
Shari Edelstein	1010A 22nd Street, N.W. Washington, D.C. 20037	Associate	November 2, 1987

<u>Name</u>	<u>Residence Address</u>	<u>Position or Connection</u>	<u>Date Connection Began</u>
Samuel Flax	4194 41st Street, N.W. Washington, D.C. 20016	Associate	May 20, 1985
Margaret Jacobs	2127 California Street, N.W. Washington, D.C. 20008	Associate	May 20, 1985
Robert McReavy	2217 Observatory Place, N.W. Washington, D.C. 20007	Associate	January 3, 1985
Gary Poon	1337 28th Street, N.W. Washington, D.C. 20007	Associate	October 27, 1986

ATTACHMENT NO. 4

8. Has your connection with any foreign principal ended during this 6 month reporting period?

/XX/ Yes

/ / No

If yes, furnish the following information:

<u>Name of Foreign Principal</u>	<u>Date of Termination</u>
Caudine Investments N.V.	November 2, 1988 <sup>1</sup>
Canadian Forest Industries Council	October 1, 1988 <sup>1</sup>
Canadian Meat Council	December 4, 1988 <sup>1</sup>
Fraser Valley Shake and Shingle Ass'n	October 18, 1988
Manitoba Energy Authority	July 1, 1988
Province of Saskatchewan	May 4, 1988

<sup>1</sup> After this date, representation of this foreign principal is limited to activities exempt from registration under Section 3 of the Act.



ATTACHMENT NO. 5

9. Have you acquired any new foreign principal during this 6 month reporting period?

/XX/

Yes

/ /

No

If yes, furnish following information:

Name and Address of Foreign Principal

Date Acquired

Fraser Valley Independent Shake  
& Shingle Association  
Four Bentall Centre  
Suite 2000  
1500 Dunsmuir Street  
Vancouver, B.C.  
CANADA U761P4

July 1988

ATTACHMENT NO. 6

10. In addition to those named in Items 8 and 9, if any, list the foreign principals whom you continued to represent during the 6 month reporting period.

Ambassador of the Swiss Confederation  
State of Israel  
International Commodities Clearing House, Ltd.  
The London Commodity Exchange (1986) Ltd.  
British American Arts Association (U.K.) Ltd.  
The London International Financial Futures  
Exchange Ltd.  
Korea Foreign Trade Association  
Republic of Venezuela  
Banco Central do Brasil  
Government of Brazil  
Consejo Empresarial Mexicano para Asuntos  
Internacionales (CEMAI)  
Venezolana de Cementos CA  
Amok Ltd.  
Eldorado Resources Ltd.  
Uranerz Exploration and Mining Limited  
-Saskatchewan Mining Development Corporation  
Profilo Holding A.S.  
ASEA Brown Boveri  
The Grain and Feed Trade Association  
The Metal Market and Exchange Company Limited  
International Bank for Reconstruction and  
Development (IBRD)  
Inter-American Development Bank (IDB)  
Government of Aruba  
Asocolflores  
Government of Canada  
Airbus Industrie  
The International Petroleum  
Exchange of London Limited  
Japan Fair Trade Center  
Government of the Republic of Panama  
Joint Exchanges Committee

ATTACHMENT NO. 7

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9 and 10 of this statement?

/XX/

Yes

/ /

No

If yes, identify each such foreign principal and describe in full detail your activities and services:

Ambassador of the Swiss Confederation

The Registrant rendered advice on U.S. laws, regulations and policies concerning judicial assistance, buy national legislation, textiles, trademarks, immigration, securities, taxation and trade.

Amok Ltd., Saskatchewan Mining Development Corporation, Eldorado Resources, Limited, Uranerz Exploration and Mining Limited

The Registrant rendered advice on U.S. laws, regulations, policies and proposed legislation relating to imports of uranium.

ASEA Brown Boveri

The Registrant rendered advice on U.S. laws, regulations and policies regarding buy national legislation.

Airbus Industrie

The Registrant rendered advice on U.S. laws, regulations and policies concerning international trade in civil aircraft, manufacture and sale of civil aircraft.

Asocolflores

The Registrant rendered advice on U.S. laws, regulations and policies concerning international trade, trade developments, proposed trade legislation, customs procedures, drug enforcement, and taxation. The Registrant also represented the principal in antidumping and countervailing duty proceedings before the U.S. Department of Commerce and the U.S. Court of International Trade concerning imports of flowers from Colombia.

Banco Central do Brasil and Government of Brazil

The Registrant rendered advice on U.S. laws, regulations and policies concerning economic issues, taxation, banking, international trade, the GATT, and securities. The Registrant also represented the principals with respect to the restructuring of Brazilian external commercial bank debt and represented the principals in obtaining a "no-action" letter from the SEC.

British American Arts Association (U.K.) Ltd.

One of the Registrant's partners served as a member of the Board of Directors of the principal, provided general information in response to inquiries on the services and activities of the principal, and advised the principal about arts exchange programs and related developments originating in the United States.

Canadian Forest Industries Council

The Registrant rendered advice on U.S. laws, regulations, policies and proposed legislation with respect to imports of lumber and other forest products from Canada.

Canadian Meat Council

The Registrant rendered advice on U.S. laws, regulations and policies concerning a possible countervailing duty case against imports of fresh, chilled and frozen pork from Canada.

Caudine Investments, N.V.

No activity.

Consejo Empresarial Mexicano para Asuntos Internacionales, A.C. (CEMAI)

The Registrant rendered advice on U.S. laws, regulations, policies and proposed legislation in connection with U.S.-Mexico trade and investment relations.

Fraser Valley Independent Shakes & Shingles Producers Association

The Registrant represented the principal in connection with a Section 203 tariff proceeding before the ITC and with interagency review of the ITC's report.

Government of Aruba

No activity.

Government of Canada

The Registrant rendered advice on GATT issues and on U.S. laws, regulations, policies and proposed legislation relating to the U.S.-Canada Free Trade Agreement and provided advice during the inter-agency phase of the Section 203 proceeding on shakes and shingles.

Government of Republic of Panama

The Registrant rendered advice to the Government of the Republic of Panama (of which Eric Arturo Delvalle is the legitimate President) on U.S. laws, regulations, and policies relating to U.S.-Panama relations, creation of a nonprofit U.S. corporation for educational purposes, and U.S. sanctions against the Noriega government, and provided representation before the U.S. Departments of Treasury and State and the U.S. Federal Reserve Board regarding Panamanian assets in the U.S., banking issues, U.S. government policy toward Panama and future U.S. financial assistance to Panama. The Registrant represented the principal in various lawsuits in various U.S. courts relating to access to assets of the Government of Panama in the United States.

Inter-American Development Bank (IDB) and the  
International Bank for Reconstruction and  
Development (IBRD)

The Registrant rendered advice on U.S. laws, regulations, policies, and proposed legislation concerning banking and taxation, and represented the IDB in an arbitrable dispute. The Registrant also represented the principals in connection with IRS ruling requests. The Registrant also represented IDB in securities and banking-related litigation.

Japan Fair Trade Center

The Registrant rendered advice on the GATT and U.S. laws, regulations and policies concerning international trade, trade developments, and proposed trade legislation.

Korea Foreign Trade Association

The Registrant rendered advice on U.S. laws, regulations and policies concerning international trade, trade developments, proposed trade legislation, and international monetary policies. The Registrant also provided data and rendered advice to the Korean government on GATT negotiations, economic and other trade matters.

London Commodity Exchange (1986) Limited, International  
Commodities Clearing House, Ltd., Metal Market and  
Exchange Co., Ltd., Grain and Feed Trade Association,  
London International Financial Futures Exchange Ltd.,  
The International Petroleum Exchange of London Limited,  
Joint Exchanges Committee

The Registrant rendered advice on U.S. laws, regulations and policies concerning the offer and sale of foreign options and futures contracts in the United States, futures commission merchants, jurisdiction, and futures markets. The Registrant rendered advice to and represented LIFFE in connection with a petition to the Securities and Exchange Commission for an amendment to Rule 3a12-8 relating to the designation of certain foreign government securities as "exempted securities."

Manitoba Energy Authority

No activity.

Profilo Holding, A.S.

The Registrant rendered advice with respect to various issues relating to Turkish/U.S. relations.

Province of Saskatchewan

No activity.

Republic of Venezuela

The Registrant rendered advice on U.S. laws, regulations and policies concerning economic issues, taxation, banking, securities and business transactions. The Registrant represented the principal with respect to implementation of agreements with commercial banks concerning the restructuring of Venezuelan external debt and new financings. The Registrant also represented the principal with respect to a Eurobond offering and various relending and on-lending transactions. The Registrant also represented the principal in a lawsuit, L'Europeenne de Banque v. La Republica de Venezuela, 86 Civ. 7808, in the United States District Court for the Southern District of New York and rendered advice concerning other related U.S. litigation.

State of Israel

The Registrant rendered advice on U.S. laws, regulations, policies, and proposed legislation concerning taxation, banking, securities, international trade, buy national legislation and on pending litigation. The Registrant represented the Government of Israel in connection with its refinancing of U.S. Foreign Military Sales Debt, which representation included the rendering of advice on U.S. laws, regulations and policies, commenting on behalf of the principal with respect to proposed regulations issued by the Treasury Department, the filing of an application and obtaining of approvals from the Defense, State and Treasury Departments, and the filing of a registration statement and related no-action request with the Securities and Exchange Commission. The Registrant also rendered advice to Israel Military Industries with respect to government procurement and customs matters.

Venezolana de Cementos

The Registrant rendered advice on U.S. laws, regulations and policies relating to antitrust, aviation, international trade, and represented the principal in connection with an investigation conducted by the Federal Trade Commission. The Registrant also represented the principal in connection with the negotiation of a joint venture and other commercial contracts.



ATTACHMENT NO. 8

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below?

☒ Yes

☐ No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Banco Central do Brasil

On behalf of the foreign principal, the Registrant had discussions regarding the restructuring of the Brazilian external debt held by commercial bank creditors with Edwin Yeo, Counselor to the President, Federal Reserve Bank of New York, on June 6, 9, 13, 14, 23, 24, July 29, August 1, 15, October 3, 4 and 28, 1988; with Michael Bradfield, General Counsel to the Federal Reserve Board, on June 9, 10, 13, 15, August 31, September 1, 9, 12 and 13, 1988; and with Philo Dibble, Office of Monetary Affairs, Department of State, on September 7, 1988.

Fraser Valley Independent Shakes and Shingles Producers Association and Government of Canada

On behalf of the foreign principals, the Registrant had discussions regarding the inter-agency phase of the review of the Section 201 tariff on Canadian shakes and shingles with Phil Jones, Legislative Assistant, Senator Evans on October 12, 1988; with Brad Figel, Senate Finance Committee, on October 12, 1988; with Josh Bolton, General Counsel, Minority Staff, Senate Finance Committee, on October 12, 1988; with Mary Ann Richardson, Legislative Assistant, Senator Adams, on October 12, 1988; with Chris Christensen, Director, Office of Forest Products, Department of Commerce, on October 20, 1988; and with William Barreda, Director, Office of International Trade, Department of the Treasury, on October 28, 1988.

Government of the Republic of Panama

On behalf of the foreign principal, the Registrant had discussions regarding proposed legislation for economic reconstruction aid to Panama with Helene Kaufman, Legislative Assistant to Representative Gejdenson on June 15, 23 and 24 and October 3, 1988; with Kathy Bertlson, Legislative Assistant to Representative Gejdenson on June 24, 1988; with Ed King, Senate Democratic Policy Committee, on June 24, 1988; with Colonel John Cash, Department of Defense, on June 24, 1988; and with Marian Campbell, House Foreign Affairs Committee, on June 24, 1988.

On behalf of the foreign principal, the Registrant had discussions regarding U.S. laws, regulations and policies relating to U.S. Panama relations with Michael Armacost, Undersecretary of State, Political Affairs, on June 6, 1988; with Mark Sullivan III, General Counsel, Treasury Department, on June 8, 9, 10 and 13, 1988; with Michael Kozac, Principal Deputy Legal Advisor, Department of State, on June 13, 16, 20, 21 and 24, July 1 and 15, September 30, October 3 and 6 and November 3 and 4, 1988; with Richard Wyrrough, Director, Office of Panamanian Affairs, Department of State, on June 14, July 27, August 1, October 3 and November 3, 1988; with Edwin Yeo, Counsellor to the President, Federal Reserve Bank, on July 1, 1988; with Peter Secor, Panama Desk, Bureau of InterAmerican Affairs, Department of State, on July 1, 1988; with Margaret Pickering, Legal Advisor's Office, on July 7, 1988; with Mark Kenchelian, Legal Advisor's Office, Department of State, on July 14, 1988; with Elizabeth Verville, Deputy Legal Advisor, Department of State, on July 14, 1988; with Russell Munk, Assistant General Counsel (International Affairs), Treasury Department, on July 15, 1988; with Rick Newcomb, Director, Office of Foreign Assets Control, Treasury Department, on July 15, 1988; and with Ted Borek, Legal Advisor's Office, Department of State, on October 3, 1988. In addition, the Registrant wrote to Rick Newcomb, Director, Office of Foreign Assets Control, Treasury Department, on July 8, 1988; Michael Kozak, Principal Deputy Legal Advisor, Department of State, on July 8, 1988; and Mark Sullivan III, General Counsel, Treasury Department, on July 8, 1988.

On behalf of the foreign principal, the Registrant had discussions regarding financial affairs of the Government of Panama with Dennis Wood, Office of Foreign Assets Control, Treasury Department, June 13, 14 and 16, 1988; with Elizabeth Farrow, Office of Foreign Assets Control, Treasury Department, on June 8 and 10, 1988; with Peter Secor, Panama Desk, Bureau of InterAmerican Affairs, Department of State, on June 17, July 1, 5, 12, 13, 14, 15, 20 and 28, August 3 and 30, September 16 and 30, and repeatedly throughout October, November and December, 1988; with Bill Hoffman, Office of Foreign Assets Control, Treasury Department, on June 6 and 17, July 6 and 7, August 31 and September 7, 20, 22 and 30, 1988; with Bob Harris, Legal Advisor's Office, Department of State, on July 8, 1988; with Ted Borek, Legal Advisor's Office, Department of State, on July 11, 1988; with Mark Kenchelian, Legal Advisor's Office, Department of State, on June 7, July 12, 14, 15, 18, 20, 21, 28 and 29, August 1, 2, 30 and 31, September 1, 7, 27 and 30, and repeatedly throughout October, November and December, 1988; with Nick Rostow, General Counsel, National Security Council, on July 12, 1988; with Mary Mochary on July 15 and August 1, 1988; with Marilyn Meunch, Office of Foreign Assets Control, Treasury Department, on July 11, 14, 15, 28 and 29, 1988; with Rick Newcomb, Office of Foreign Assets Control, Treasury Department, on June 6, July 1, 14, 15 and 29, August 31, September 1 and 27 and repeatedly throughout October, November and December, 1988; with Richard Wyrrough, Director, Office of Panamanian Affairs, Department of State, on July 28 and August 1, 1988; with Joyce Motylewski, Federal Reserve Bank of New York, on July 29 and September 1 and 20, 1988; with Michael Kozak, Principal Deputy Legal Advisor, Department of State, on August 1, 1988; with Kathleen Tyson, New York Federal Reserve Bank, on September 7, 1988; and with Loren Dohm, Office of Foreign Assets Control, Treasury Department, on June 9, 10, 13 and 14, July 1, 11, 12, 14 and 15 and September 30, 1988.

On behalf of the foreign principal, the Registrant had discussions regarding Executive Branch sanctions against Panama with Richard Wyrrough, Director, Office of Panamanian Affairs, Department of State, on July 21, 1988; and with Dick McCall, Legislative Assistant to Senator Kerry, on July 26, 1988.

On behalf of the foreign principal, the Registrant had discussions regarding Air Panama with Rick Newcomb, Office of Foreign Assets Control, on September 19 and 23, 1988; and with Peter Secor, Panama Desk, Bureau of InterAmerican Affairs, Department of State, on September 23, 1988.

On behalf of the foreign principal, the Registrant had numerous discussions with reporters including the following: Bob Zelnick, ABC News, on July 27, 1988; Sheilah Kast, ABC News, on July 27, 1988; Sig Karchem, Bureau of National Affairs, on August 1, 1988; and Peter Kornblugh, National Security Archives on August 18, 1988.

#### Profilo Holding, A.S.

On behalf of the foreign principal, the Registrant had discussions regarding U.S.-Turkey relations with Representative Steve Solarz on June 15, 1988; with Senator Robert Packwood on June 15, 1988; with Representative Steny Hoyer on September 7, 1988; and with Stan Roth, Staff Director, Subcommittee on Asian and Pacific Affairs, House Foreign Affairs Committee, on November 21, 1988.

#### Republic of Venezuela

On behalf of the foreign principal, the Registrant had discussions regarding Venezuelan debt restructurings and new financings with Edwin Yeo, Counsellor to the President, Federal Reserve Bank, on June 24, July 12, 14, 18, 19, 25 and 29, August 8, 11, 15 and 29, September 13, 21 and 29 and October 3 and 28, 1988.

ATTACHMENT NO. 9

14.(a) Receipts -- Monies

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

  X   Yes            No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

<u>Date</u>	<u>From whom</u>	<u>Purpose</u>	<u>Amount</u>
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The following information relates to activities that would be exempt from registration under Section 3 of the Act, as well as activities that are not exempt.

Venezuela, Gov't of

07/18/88	Venezuela, Gov't of	Fees	\$ 29,690.75
07/18/88	Venezuela, Gov't of	Disbursements	27,284.63
07/21/88	Venezuela, Gov't of	Fees	50,953.00
07/21/88	Venezuela, Gov't of	Disbursements	4,354.82
08/22/88	Venezuela, Gov't of	Fees	58,223.25
08/22/88	Venezuela, Gov't of	Disbursements	8,921.33
09/07/88	Venezuela, Gov't of	Fees	56,338.75
09/07/88	Venezuela, Gov't of	Disbursements	8,282.27
11/14/88	Venezuela, Gov't of	Fees	83,465.00
11/14/88	Venezuela, Gov't of	Disbursements	<u>9,137.22</u>
		Total Fees	278,670.75
		Total Disbs.	57,980.27

Joint Exchanges Committee

06/30/88	Joint Exchanges Committee	Fees	\$ 3,600.00
06/30/88	Joint Exchanges Committee	Disbursements	161.33
10/19/88	Joint Exchanges Committee	Fees	700.00
10/19/88	Joint Exchanges Committee	Disbursements	<u>9.90</u>
		Total Fees	4,300.00
		Total Disbs.	171.23

London Int'l Financial Futures

07/12/88	London Int'l Financial Futures	Fees	\$ 6,500.00
07/12/88	London Int'l Financial Futures	Disbursements	316.49

Receipts (cont.)

<u>Date</u>	<u>From whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>ASEA AB</u>			
07/18/88	ASEA, Inc.	Fees	\$ 4,455.00
07/18/88	ASEA, Inc.	Disbursements	2,223.58
09/06/88	ASEA, Inc.	Fees	850.00
09/06/88	ASEA, Inc.	Disbursements	<u>390.50</u>
		Total Fees	5,305.00
		Total Disbs.	2,614.08
<u>AMOK Limited</u>			
<u>Eldorado Resources Limited</u>			
<u>Uranerz Exploration and Mining Limited</u>			
<u>Saskatchewan Mining Development Corporation</u>			
06/24/88	AMOK Limited	Fees	\$ 442.50
06/24/88	AMOK Limited	Disbursements	3,263.41
06/28/88	Uranerz Exploration & Min. Ltd.	Fees	1,327.50
06/28/88	Uranerz Exploration & Min. Ltd.	Disbursements	9,790.23
07/05/88	Eldorado Resources Limited	Fees	10,081.50
07/05/88	Eldorado Resources Limited	Disbursements	26,706.22
07/18/88	AMOK Limited	Fees	203.00
07/18/88	AMOK Limited	Disbursements	1,884.16
07/19/88	Saskatchewan Mining and Dev.	Fees	609.00
07/19/88	Saskatchewan Mining and Dev.	Disbursements	5,652.51
07/25/88	Eldorado Resources Limited	Fees	609.00
07/25/88	Eldorado Resources Limited	Disbursements	5,652.51
08/02/88	Uranerz Exploration & Min. Ltd.	Fees	609.00
08/02/88	Uranerz Exploration & Min. Ltd.	Disbursements	5,652.51
08/17/88	Saskatchewan Mining and Dev.	Fees	912.00
08/17/88	Saskatchewan Mining and Dev.	Disbursements	4,198.78
08/18/88	AMOK Limited	Fees	304.00
08/18/88	AMOK Limited	Disbursements	1,399.61
08/22/88	Eldorado Resources Limited	Fees	912.00
08/22/88	Eldorado Resources Limited	Disbursements	4,198.78
08/30/88	Uranerz Exploration & Min. Ltd.	Fees	912.00
08/30/88	Uranerz Exploration & Min. Ltd.	Disbursements	4,198.78
09/21/88	Eldorado Resources Limited	Fees	222.00
09/21/88	Eldorado Resources Limited	Disbursements	6,050.54
09/22/88	Saskatchewan Mining and Dev.	Fees	222.00
09/22/88	Saskatchewan Mining and Dev.	Disbursements	6,050.54
09/27/88	AMOK Limited	Fees	74.00
09/27/88	AMOK Limited	Disbursements	2,016.85
09/29/88	Uranerz Exploration & Min. Ltd.	Fees	222.01
09/29/88	Uranerz Exploration & Min. Ltd.	Disbursements	6,050.53
10/25/88	Saskatchewan Mining and Dev.	Fees	70.50
10/25/88	Saskatchewan Mining and Dev.	Disbursements	3,139.26
10/28/88	Uranerz Exploration & Min. Ltd.	Fees	70.50
10/28/88	Uranerz Exploration & Min. Ltd.	Disbursements	3,139.26
10/31/88	AMOK Limited	Fees	23.50
10/31/88	AMOK Limited	Disbursements	1,046.42

## Receipts (cont.)

Date	From Whom	Purpose	Amount
<u>AMOK Limited (cont.)</u>			
<u>Eldorado Resources Limited</u>			
<u>Uranerz Exploration and Mining Limited</u>			
<u>Saskatchewan Mining Development Corporation</u>			
11/02/88	Eldorado Resources Limited	Fees	\$ 70.50
11/02/88	Eldorado Resources Limited	Disbursements	3,139.26
11/21/88	Saskatchewan Mining and Dev.	Fees	1,327.50
11/21/88	Saskatchewan Mining and Dev.	Disbursements	9,790.23
11/28/88	AMOK Limited	Fees	30.00
11/28/88	AMOK Limited	Disbursements	1,185.05
		Total Fees	19,254.01
		Total Disb.	114,205.44
<u>Canadian Forest Industries Council</u>			
06/07/88	Canadian Forest Industries Council	Fees	\$ 891.55
06/07/88	Canadian Forest Industries Council	Disbursements	108.45
07/11/88	Canadian Forest Industries Council	Fees	730.67
07/11/88	Canadian Forest Industries Council	Disbursements	269.33
08/08/88	Canadian Forest Industries Council	Fees	725.26
08/08/88	Canadian Forest Industries Council	Disbursements	274.74
09/14/88	Canadian Forest Industries Council	Fees	1,000.00
10/14/88	Canadian Forest Industries Council	Fees	1,000.00
11/10/88	Canadian Forest Industries Council	Fees	1,000.00
		Total Fees	5,347.48
		Total Disbs.	652.52
<u>Caudine Investments, N.V.</u>			
08/25/88	Standard Chartered	Fees	\$ 950.00
08/25/88	Standard Chartered	Disbursements	1.05
<u>Canadian Meat Council</u>			
07/20/88	Canadian Meat Council	Fees	\$ 2,680.00
07/20/88	Canadian Meat Council	Disbursements	4,070.71
09/15/88	Canadian Meat Council	Fees	355.00
09/15/88	Canadian Meat Council	Disbursements	17.51
		Total Fees	3,035.00
		Total Disbs.	4,088.22
<u>The Republic of Panama</u>			
08/05/88	Republic of Panama	Fees	\$ 237,487.81
08/05/88	Republic of Panama	Disbursements	12,512.19
<u>Korea Foreign Trade Association</u>			
06/06/88	Korea Foreign Trade Assoc.	Fees	\$ 40,665.25
06/06/88	Korea Foreign Trade Assoc.	Disbursements	3,518.77
10/25/88	Korea Foreign Trade Assoc.	Fees	162,642.05
10/25/88	Korea Foreign Trade Assoc.	Disbursements	37,490.55
		Total Fees	203,307.30
		Total Disbs.	41,009.32

Receipts (cont.)

<u>Date</u>	<u>From whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Banco Central Do Brasil</u>			
07/06/88	Banco Central Do Brasil	Fees	\$ 298,474.50
07/06/88	Banco Central Do Brasil	Disbursements	40,296.56
07/11/88	Banco Central Do Brasil	Fees	587,301.60
07/11/88	Banco Central Do Brasil	Disbursements	122,716.78
		Total Fees	885,776.10
		Total Disbs.	163,013.34
<u>Consejo Empresarial Mexicano (CEMAI)</u>			
06/30/88	Consejo Empresarial Mexicano	Fees	\$ 4,000.00
06/30/88	Consejo Empresarial Mexicano	Disbursements	200.00
07/19/88	Consejo Empresarial Mexicano	Fees	600.00
07/19/88	Consejo Empresarial Mexicano	Disbursements	8,100.00
08/15/88	Consejo Empresarial Mexicano	Fees	3,631.00
08/15/88	Consejo Empresarial Mexicano	Disbursements	5,669.00
08/16/88	Consejo Empresarial Mexicano	Disbursements	300.00
08/26/88	Consejo Empresarial Mexicano	Fees	2,391.98
08/26/88	Consejo Empresarial Mexicano	Disbursements	1,908.02
09/08/88	Consejo Empresarial Mexicano	Fees	2,700.00
09/22/88	Consejo Empresarial Mexicano	Fees	6,000.00
09/30/88	Consejo Empresarial Mexicano	Fees	5,100.00
10/25/88	Consejo Empresarial Mexicano	Fees	5,700.00
11/23/88	Consejo Empresarial Mexicano	Fees	2,100.00
		Total Fees	32,222.98
		Total Disbs.	16,177.02
<u>Profilo Holding, A.S.</u>			
<u>Enka Holding Yatirim, A.S.</u>			
<u>Halk Sigorta T.A.S.</u>			
<u>Sezai Turkes-Feyzi Akkaya Construction Co.</u>			
<u>Iktisat Bankasi</u>			
<u>Ak-Pa Tekstil Ihracat Pazarlama, A.S.</u>			
08/24/88	Enka Holding Yatirim, A.S.	Fees	\$ 3,600.00
09/01/88	Sezai Turkes-Feyzi Akkaya	Fees	7,200.00
10/13/88	Enka Holding Yatirim, A.S.	Fees	3,600.00
10/25/88	Profilo Holding, A.S.	Fees	7,200.00
11/10/88	Ak-Pa Tekstil Ihracar Pazarlama	Fees	7,200.00
		Total Fees	28,800.00
<u>Fair Trade Center</u>			
10/14/88	Fair Trade Center	Fees	\$ 6,915.47
10/14/88	Fair Trade Center	Disbursements	8,084.53
<u>Fraser Valley Independent Shake and Shingle</u>			
08/18/88	Fraser Valley Independent	Fees	\$ 90,000.00
10/21/88	Fraser Valley Independent	Fees	12,142.50
10/21/88	Fraser Valley Independent	Disbursements	33,446.22
		Total Fees	102,142.50
		Total Disbs.	33,446.22



Receipts (cont.)

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Int'l Bank for Reconstruction &amp; Development</u>			
06/14/88	Int'l Bank for Recon. & Dev.	Fees	\$ 9,832.55
06/14/88	Int'l Bank for Recon. & Dev.	Disbursements	130.27
08/04/88	Int'l Bank for Recon. & Dev.	Fees	2,325.00
08/04/88	Int'l Bank for Recon. & Dev.	Disbursements	95.77
08/31/88	Int'l Bank for Recon. & Dev.	Fees	2,325.00
08/31/88	Int'l Bank for Recon. & Dev.	Disbursements	95.77
10/03/88	Int'l Bank for Recon. & Dev.	Fees	935.00
10/03/88	Int'l Bank for Recon. & Dev.	Disbursements	15.60
		Total Fees	15,417.55
		Total Disbs.	337.41
<u>Manitoba Energy Authority</u>			
06/24/88	Manitoba Energy Authority	Fees	\$ 1,127.50
06/24/88	Manitoba Energy Authority	Disbursements	2,019.96
07/15/88	Manitoba Energy Authority	Fees	1,968.75
07/15/88	Manitoba Energy Authority	Disbursements	1,215.82
		Total Fees	3,096.25
		Total Disbs.	3,235.78
<u>London Commodity Exchange</u>			
08/10/88	London Commodity Exchange	Fees	\$ 900.00
08/10/88	London Commodity Exchange	Disbursements	76.97
<u>Inter-American Development Bank (IDB)</u>			
06/21/88	Inter-Amer. Dev. Bank	Fees	\$ 9,832.55
06/21/88	Inter-Amer. Dev. Bank	Disbursements	130.27
11/16/88	Inter-Amer. Dev. Bank	Fees	2,375.00
11/16/88	Inter-Amer. Dev. Bank	Disbursements	44.25
		Total Fees	12,207.55
		Total Disbs.	174.52
<u>Ambassador of the Swiss Confederation</u>			
06/21/88	Embassy of Switzerland	Fees	\$ 7,860.00
06/21/88	Embassy of Switzerland	Disbursements	1,627.46
08/15/88	Embassy of Switzerland	Fees	10,095.00
08/15/88	Embassy of Switzerland	Disbursements	678.92
		Total Fees	17,955.00
		Total Disbs.	2,306.38
<u>State of Israel</u>			
06/10/88	State of Israel	Fees	\$ 4,086.14
07/19/88	State of Israel	Fees	7,590.00
07/19/88	State of Israel	Disbursements	630.55
10/24/88	State of Israel	Fees	916,746.25
10/24/88	State of Israel	Disbursements	85,679.90
		Total Fees	928,422.39
		Total Disbs.	86,310.45

Receipts (cont.)

<u>Date</u>	<u>From whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Israel Military Industries</u>			
06/17/88	Israel Military Industries	Fees	\$ 5,280.94
06/17/88	Israel Military Industries	Disbursements	328.91
08/15/88	Israel Military Industries	Fees	14,949.35
08/15/88	Israel Military Industries	Disbursements	1,325.93
09/21/88	Israel Military Industries	Fees	14,461.88
09/21/88	Israel Military Industries	Disbursements	2,219.16
09/22/88	Israel Military Industries	Fees	29,432.82
09/22/88	Israel Military Industries	Disbursements	1,402.40
10/31/88	Israel Military Industries	Fees	5,452.50
10/31/88	Israel Military Industries	Disbursements	280.23
11/28/88	Israel Military Industries	Fees	8,653.13
11/28/88	Israel Military Industries	Disbursements	409.79
		Total Fees	78,230.62
		Total Disbs.	5,966.42
<u>Asocolflores</u>			
06/10/88	Asocolflores	Fees	\$ 1,063.00
07/05/88	Asocolflores	Fees	986.00
07/05/88	Asocolflores	Disbursements	1.30
07/08/88	Asocolflores	Fees	39,536.75
07/08/88	Asocolflores	Disbursements	19,606.56
07/12/88	Asocolflores	Fees	461.75
09/13/88	Asocolflores	Fees	2,832.50
09/13/88	Asocolflores	Disbursements	2,632.76
09/15/88	Asocolflores	Fees	147.50
09/23/88	Asocolflores	Fees	6,497.50
10/18/88	Asocolflores	Fees	34,654.35
10/18/88	Asocolflores	Disbursements	11,124.97
10/21/88	Asocolflores	Fees	250.00
10/21/88	Asocolflores	Disbursements	5.70
10/24/88	Asocolflores	Fees	2,176.50
11/10/88	Asocolflores	Fees	1,957.50
11/10/88	Asocolflores	Disbursements	30.60
		Total Fees	90,563.35
		Total Disbs.	33,401.89
<u>Government of Canada</u>			
08/18/88	Government of Canada	Fees	\$ 16,535.00
08/18/88	Government of Canada	Disbursements	1,101.96
09/29/88	Government of Canada	Fees	26,851.25
09/29/88	Government of Canada	Disbursements	9,133.74
10/25/88	Government of Canada	Fees	9,753.75
10/25/88	Government of Canada	Disbursements	448.26
11/01/88	Government of Canada	Fees	2,422.05
		Total Fees	55,562.05
		Total Disbs.	10,683.96

Receipts (cont.)

<u>Date</u>	<u>From whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Airbus Industrie</u>			
06/08/88	Airbus Industrie	Fees	\$ 99,117.50
06/08/88	Airbus Industrie	Disbursements	22,494.22
06/30/88	Airbus Industrie	Fees	173,126.25
06/30/88	Airbus Industrie	Disbursements	41,451.70
08/29/88	Airbus Industrie	Fees	12,072.50
08/29/88	Airbus Industrie	Disbursements	4,678.93
10/07/88	Airbus Industrie	Fees	8,208.18
10/11/88	Airbus Industrie	Fees	2,825.02
10/11/88	Airbus Industrie	Disbursements	35.18
10/19/88	Airbus Industrie	Fees	68,951.65
10/19/88	Airbus Industrie	Disbursements	<u>3,273.17</u>
		Total Fees	364,301.10
		Total Disbs.	71,933.20
 <u>Venezolana de Cementos CA</u>			
07/15/88	Venezolana de Cementos CA	Fees	\$ 42,740.00
07/15/88	Venezolana de Cementos CA	Disbursements	5,296.53
09/30/88	Venezolana de Cementos CA	Fees	16,300.00
09/30/88	Venezolana de Cementos CA	Disbursements	337.67
10/13/88	Venezolana de Cementos CA	Fees	189,525.00
10/13/88	Venezolana de Cementos CA	Disbursements	<u>39,387.54</u>
		Total Fees	248,565.00
		Total Disbs.	45,021.74

ATTACHMENT NO. 10

15.(a) Disbursements -- Monies

During this 6 month reporting period, have you

- (1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 or 10 of this statement?

  X   Yes            No

- (2) transmitted monies to any such foreign principal?

           Yes   X   No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
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The following information relates to activities that would be exempt from registration under Section 3 of the Act, as well as activities that are not exempt.

Ambassador of the Swiss Confederation

11/01/88	Lexis	Computer Research	\$ 46.40
06/14/88	U.S. Chamber of Commerce	Duplicating	184.35
Various	Xerox Corporation	Duplicating	248.50
Various	U.S. Postal Service	Postage	28.90
10/04/88	Downtown Courier	Courier	10.20
Various	Falcon Express	Courier	73.40
07/25/88	Research Information Service	Document Retrieval	62.81
		TOTAL	\$ 654.56

The International Petroleum Exchange of London Limited

07/01/88	Xerox Corportion	Duplicating	\$ 11.00
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Embassy of Israel

11/04/88	Xerox Corporation	Duplicating	\$ 15.00
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Caudine Investments, N.V.

Various	Xerox Corporation	Duplicating	\$ 12.45
07/26/88	Curacao Int'l Trust Company	Professional Service fees (registered agent in Netherlands/Antilles)	1,522.59
		TOTAL	\$ 1,535.04

(Attachment No. 10 is continued on following page.)

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Canadian Forest Industries Council</u>			
Various	Xerox Corporation	Duplicating	\$ 174.89
Various	C & P Telephone	Telephone	99.53
Various	A & P Employees	Local Transportation	43.90
Various	A & P Employees	Cash Expenses	31.70
Various	U.S. Postal Service	Postage	2.12
Various	Falcon Express	Courier	28.10
06/10/88	Federal Express	Courier	25.60
Various	National News Agency	Publications	318.36
11/07/88	Treasurer of the United States	Document Retrieval	429.25
		TOTAL	\$ 1,153.45
<u>Joint Exchanges Committee</u>			
07/01/88	A & P Employees	Cash Expenses	\$ 15.00
08/01/88	Lexis	Computer Research	120.00
07/13/88	Falcon Express	Courier	9.60
		TOTAL	\$ 144.60
<u>London International Financial Futures</u>			
Various	Xerox Corporation	Duplicating	\$ 255.60
Various	U.S. Postal Service	Postage	9.30
Various	C & P Telephone	Telephone	53.54
09/20/88	Research Information Service	Document Retrieval	195.75
07/19/88	Federal Express	Courier	21.50
Various	Falcon Express	Courier	50.00
		TOTAL	\$ 585.69
<u>London Commodity Exchange (1986) Limited</u>			
<u>International Commodities Clearing House Ltd.</u>			
<u>Grain &amp; Feed Trade Association</u>			
<u>The Metal Market &amp; Exchange Company Limited</u>			
<u>London International Financial Futures Exchange Limited</u>			
Various	Xerox Corporation	Duplicating	\$ 91.05
Various	U.S. Postal Service	Postage	5.78
08/17/88	Falcon Express	Courier	8.00
Various	C & P Telephone	Telephone	23.57
11/01/88	Lexis	Computer Research	59.20
		TOTAL	\$ 187.60
<u>Manitoba Energy Authority</u>			
09/12/88	Xerox	Duplicating	\$ 18.90
Various	APCO Associates	Professional Service fees	2,754.41
		TOTAL	\$ 2,773.31

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>The State of Israel</u>			
09/01/88	Balmar Copy Centers	Printing	\$ 174.81
Various	Xerox Corporation	Duplicating	31,323.17
Various	A & P Employees	Local Transportation	9,659.25
Various	C & P Telephone	Telephone	3,951.64
Various	New York Telephone	Telephone	4,656.63
Various	A & P Employees	Cash Expenses	12,474.13
Various	Lexis	Computer Research	6,439.20
Various	Westlaw	Computer Research	2,421.00
Various	Archer Services	Courier	386.50
Various	Downtown Courier	Courier	222.81
Various	Falcon Express	Courier	2,158.75
Various	DHL Airways, Inc.	Courier	372.00
Various	Grace Courier	Courier	2,071.00
Various	Federal Express	Courier	2,468.10
Various	Bridge Delivery Systems, Inc.	Courier	52.50
Various	Dworkin/Cosell Couriers, Inc.	Courier	126.00
Various	A & P Attorneys	Travel Expenses (Conf. with client)	7,830.99
Various	U.S. Postal Service	Postage	17.78
06/15/88	Practising Law Institute	Publications	243.27
07/27/88	ABA Tax Section	Publications	12.50
Various	Charles E. Simon & Co.	Document Retrieval	2,087.41
Various	Bechtel Information Services	Document Retrieval	1,037.48
06/08/88	Kutak, Rock & Campbell	Document Retrieval	75.75
Various	Research Information Services	Document Retrieval	3,639.77
11/11/88	Thomson & Thomsom	Document Retrieval	250.00
Various	Disclosure	Document Retrieval	439.73
Various	Securities & Exchange Commission	Filing Fees	2,150.00
Various	Kroll Stationers, Inc.	Supplies	84.80
Various	M.S. Ginns	Supplies	732.41
		TOTAL	\$ 97,559.38

Israel Military Industries

Various	Xerox Corporation	Duplicating	\$ 1,612.68
Various	C & P Telephone	Telephone	240.68
Various	U.S. Postal Service	Postage	4.25
Various	A & P Employees	Local Transportation	109.50
Various	A & P Employees	Cash Expenses	40.94
Various	Lexis	Computer Research	1,078.20
Various	Westlaw	Computer Research	111.60
Various	Falcon Express	Courier	489.15
Various	Federal Express	Courier	59.25

Disbursements (Cont.)Israel Military Industries (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
Various	Downtown Courier	Courier	32.10
Various	A & P Attorneys	Travel Expense (Conf. with client)	973.87
		TOTAL	\$ 4,752.22

Government of Aruba

09/20/88	Falcon Express	Courier	\$ 12.20
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British American Arts Association (U.K.) Ltd.

Various	Xerox Corporation	Duplicating	\$ .63
Various	C & P Telephone	Telephone	4.09
		TOTAL	\$ 4.72

Consejo Empresarial Mexicano para Asuntos (CEMAI)

10/24/88	U.S. Department of Commerce	Duplicating	\$ 3.15
Various	Xerox Corporation	Duplicating	417.56
Various	Federal Express	Courier	54.40
08/12/88	DHL Airways, Inc.	Courier	89.00
Various	Falcon Express	Courier	84.45
09/01/88	Lexis	Computer Research	371.20
Various	C & P Telephone	Telephone	365.38
Various	A & P Employees	Local Transportation	65.33
09/01/88	A & P Employees	Cash Expenses	4.00
Various	U.S. Postal Service	Postage	2.55
Various	APCO Associates	Professional Service fees	23,150.00
Various	A & P Attorneys	Travel Expense (Conf. with client)	1,341.94
		TOTAL	\$ 25,948.96

Int'l Bank for Reconstruction & Development

Various	Xerox Corporation	Duplicating	\$ 46.15
Various	C & P Telephone	Telephone	27.64
Various	A & P Employees	Local Transportation	2.25
Various	A & P Employees	Cash Expenses	7.50
Various	Falcon Express	Courier	22.85
06/13/88	Federal Express	Courier	18.75
		TOTAL	\$ 125.14

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Government of Canada</u>			
Various	Xerox Corporation	Duplicating	\$ 1,008.45
Various	U.S. Postal Service	Postage	2.80
Various	C & P Telephone	Telephone	341.47
Various	A & P Employees	Local Transportation	175.14
Various	A & P Employees	Cash Expenses	100.27
Various	Federal Express	Courier	128.25
Various	Falcon Express	Courier	337.90
Various	Lexis	Computer Research	568.00
Various	A & P Attorneys	Travel Expenses (Conf. with client)	448.26
08/31/88	Superintendent of Documents	Publications	32.00
Various	APCO Associates	Professional Service fees	20,218.58
		<b>TOTAL</b>	<b>\$ 23,361.12</b>
<u>ASEA A.B.</u>			
Various	Xerox Corporation	Duplicating	\$ 148.10
Various	C & P Telephone	Telephone	31.73
Various	U.S. Postal Service	Postage	16.35
Various	A & P Employees	Cash Expenses	60.22
Various	Falcon Express	Courier	17.30
11/17/88	Downtown Courier	Courier	27.00
07/29/88	Western Union Int'l Inc.	Telex	8.28
Various	APCO Associates	Professional Service fees	815.22
		<b>TOTAL</b>	<b>\$ 1,124.20</b>
<u>Korea Foreign Trade Association (formerly Korean Traders Association)</u>			
Various	Xerox Corporation	Duplicating	\$ 3,137.87
Various	C & P Telephone	Telephone	5,177.08
Various	A & P Employees	Cash Expenses	2,250.89
Various	A & P Employees	Local Transportation	153.00
06/22/88	Downtown Courier	Courier	7.80
Various	Falcon Express	Courier	149.55
Various	A & P Attorneys	Travel Expense (Conf. with client)	959.55
Various	Lexis	Computer Research	296.00
06/29/88	APCO Associates	Professional Service fees	783.25
		<b>TOTAL</b>	<b>\$ 12,914.99</b>



Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Canadian Meat Council</u>			
Various	Xerox Corporation	Duplicating	\$ 463.63
Various	C & P Telephone	Telephone	89.89
Various	A & P Employees	Local Transportation	20.50
Various	A & P Employees	Cash Expenses	68.00
11/01/88	Lexis	Computer Research	80.00
Various	Federal Express	Courier	33.60
07/13/88	Falcon Express	Courier	9.05
06/29/88	APCO Associates	Professional Service fees	140.00
		TOTAL	\$ 904.67

AMOK LimitedEldorado Resources LimitedUranerz Exploration and Mining LimitedSaskatchewan Mining Development Corporation

Various	Xerox Corporation	Duplicating	\$ 312.60
Various	C & P Telephone	Telephone	140.69
11/22/88	Western Union Int'l	Telex	3.99
06/23/88	A & P Employees	Local Transportation	5.20
Various	A & P Employees	Cash Expenses	59.82
07/13/88	Falcon Express	Courier	8.00
Various	Federal Express	Courier	76.70
07/01/88	Lexis	Computer Research	68.80
Various	APCO Associates	Professional Service fees	66,663.99
		TOTAL	\$ 67,339.79

Profilo Holdings A.S.

Various	Xerox Corporation	Duplicating	\$ 181.08
Various	C & P Telephone	Telephone	403.72
Various	Western Union Int'l	Telex	72.86
Various	A & P Employees	Local Transportation	607.00
Various	A & P Employees	Cash Expenses	696.64
Various	A & P Attorneys	Travel Expense (Conf with client)	4,727.26
09/23/88	TRAC Tours	Seminar Fees	99.50
10/13/88	DHL Airways, Inc.	Courier	78.00
Various	Falcon Express	Courier	51.20
Various	Federal Express	Courier	17.50
Various	APCO Associates	Professional Service fees	13,148.95
		TOTAL	\$ 20,083.71

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Banco Central do Brasil</u>			
Various	Xerox Corporation	Duplicating	\$ 22,976.92
11/22/88	U.S. Treasurer	Duplicating	22.35
06/16/88	Georgetown University Library	Duplicating	3.60
Various	U.S. Postal Service	Postage	6.62
Various	Western Union Int'l	Telex	728.02
Various	RCA Global Communication	Telex	390.63
Various	AT & T Communications	Telex	475.14
Various	C & P Telephone	Telephone	4,536.29
Various	New York Telephone Co.	Telephone	29,243.90
Various	A & P Employees	Local Transportation	4,846.82
Various	A & P Employees	Cash Expenses	8,875.51
Various	Falcon Express	Courier	641.45
Various	Downtown Courier	Courier	324.70
Various	Grace Courier	Courier	344.20
Various	DHL Airways	Courier	9,315.00
Various	Archer Services	Courier	348.24
Various	Federal Express	Courier	864.25
10/13/88	Network Courier Service	Courier	349.00
07/26/88	Sureway Air Traffic Corporation	Courier	189.00
10/31/88	Bridge Delivery Systems, Inc.	Courier	45.00
Various	National News Agency	Publications	496.62
06/07/88	International Monetary Fund	Publications	7.50
11/22/88	Euromoney Publications	Publications	140.00
Various	Superintendent of Documents	Publications	40.65
11/22/88	George Washington University	Publications	50.00
Various	Booklink Corporation	Publications	73.80
09/09/88	United Nations	Publications	20.00
11/22/88	Latin American Information Service	Publications	112.50
Various	Lexis	Computer Research	1,538.18
10/01/88	Westlaw	Computer Research	234.00
06/15/88	Kroll Stationers	Supplies	119.12
Various	A & P Attorneys	Travel Expense (Confs w/client, attending nego- tations in New York and Caracas, and accompanying Brazilian delegation for various meetings abroad)	75,514.94
11/04/88	British Airways	Customs Charge	50.00
08/31/88	Research Information Services	Document Retrieval	136.57
Various	Rent-A-PC	Laser Printer Rental	790.22
09/08/88	Worms & Company Inc.	Professional Service fees	2,199.64
07/20/88	Ernst & Whinney	Professional Service fees	9,337.00
Various	The Secura Group	Professional Service fees	2,315.00
Various	J.J. Meaney	Housing, Furnishings and Management Serv.	16,243.02
TOTAL			\$ 193,945.40

(Attachment No. 10 continued on following page)

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Government of the Republic of Panama</u>			
Various	Xerox Corporation	Duplicating	\$ 4,924.96
Various	C & P Telephone	Telephone	458.04
Various	U.S. Postal Service	Postage	2.85
Various	A & P Employees	Local Transportation	539.21
Various	A & P Employees	Cash Expenses	146.69
Various	Lexis	Computer Research	2,010.24
Various	Westlaw	Computer Research	1,161.00
Various	Federal Express	Courier	568.45
Various	Falcon Express	Courier	997.75
Various	Grace Courier	Courier	48.00
Various	Downtown Courier	Courier	125.10
Various	A & P Attorneys	Travel Expense (Conf. with client)	1,030.93
Various	State Department	Authentication Fees	44.00
Various	Superintendent of Documents	Publications	3.25
		TOTAL	\$ 12,060.47

Fraser Valley Independent Shake and Shingle

Various	Xerox Corporation	Duplicating	\$ 1,842.01
Various	C & P Telephone	Telephone	36.86
Various	U.S. Postal Service	Postage	31.50
Various	A & P Employees	Local Transportation	210.19
Various	A & P Employees	Cash Expenses	330.15
Various	Lexis	Computer Research	693.20
Various	Federal Express	Courier	91.85
Various	Falcon Express	Courier	145.10
07/11/88	National Association of Home	Publications	12.00
Various	A & P Attorneys	Travel Expense (Conf. with client)	1,225.96
09/30/88	APCO Associates	Professional Service fees	1,000.00
10/24/88	Jay Gruenfeld Associates, Inc.	Professional Service fees	825.00
10/24/88	Wesley Rickard, Inc.	Professional Service fees (for preparation of report)	25,850.00
09/30/88	Heritage Reporting Corporation	Transcripts	1,152.40
		TOTAL	\$ 33,446.22

International Commodities Clearing House Ltd.

09/30/88	Xerox Corporation	Duplicating	\$ 6.60
10/21/88	U.S. Postal Service	Postage	.45
Various	CT Corporation System	Professional Service fees	412.50
		TOTAL	\$ 419.55

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Venezolana de Cementos CA</u>			
Various	Xerox Corporation	Duplicating	\$ 2,781.99
06/30/88	Western Union Int'l	Telex	24.33
06/30/88	RCA Global Communications	Telex	10.63
Various	C & P Telephone	Telephone	1,325.94
Various	A & P Employees	Local Transportation	491.79
Various	A & P Employees	Cash Expenses	1,085.05
07/13/88	Falcon Express	Courier	9.75
Various	DHL Airways	Courier	111.00
Various	Federal Express	Courier	492.35
07/14/88	Downtown Courier	Courier	4.20
Various	Lexis	Computer Research	125.66
06/14/88	West Publishing Company	Publications	97.45
07/26/88	George Washington University	Publications	10.00
Various	A & P Attorneys	Travel Expense (Conf. with client)	5,303.37
07/01/88	Internal Revenue Service	Filing Fees	62.16
		TOTAL	\$ 11,935.67

Japan Fair Trade Center

06/14/88	U.S. Department of Commerce	Duplicating	\$ 16.80
Various	Xerox Corporation	Duplicating	445.95
Various	C & P Telephone	Telephone	97.82
Various	A & P Employees	Local Transportation	48.00
Various	A & P Employees	Cash Expenses	42.38
11/16/88	Falcon Express	Courier	9.60
Various	DHL Airways	Courier	188.00
Various	APCO Associates	Professional Service fees	1,613.75
		TOTAL	\$ 2,462.30

Venezuela, Gov't of

Various	Xerox Corporation	Duplicating	\$ 14,971.00
07/11/88	American Bank Note Company	Printing	5,135.00
Various	C & P Telephone	Telephone	4,808.82
Various	A & P Employees	Local Transportation	2,568.81
Various	A & P Employees	Cash Expenses	2,178.29
Various	A & P Attorneys	Travel Expense (Negotiations and consul- tations w/client in New York and Venezuela)	26,067.68
Various	Downtown Courier	Courier	45.05
Various	DHL Airways	Courier	398.00
Various	Federal Express	Courier	696.90
Various	Falcon Express	Courier	221.25
Various	World Courier	Courier	2,444.00
Various	Grace Courier Service, Inc.	Courier	78.50

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Venezuela, Gov't of (cont.)</u>			
Various	Lexis	Computer Research	\$ 1,364.80
11/01/88	Westlaw	Computer Research	28.80
11/22/88	Latin American Information Service	Publications	112.50
Various	National News Agency	Publications	435.73
09/09/88	U.S. Postal Service	Postage	1.65
08/23/88	Law Debenture Trust Corporation (England)	Process Agent Service fees	1,199.45
09/19/88	Banque Internationale a Luxembourg	Professional Service fees (listing fee re: bond issue)	6,144.03
09/01/88	Virginia Polk	Translation Service fees	600.00
10/14/88	Freshfields	Professional Service fees (Consultants on English law)	4,600.00
Various	CT Corporation System	Process Agent Service fees	1,894.00
Various	Dila Blanco	Professional Service fees (Secretarial Services)	1,500.00
06/20/88	The Secura Group	Professional Service fees (Consultation)	60.00
10/28/88	Securities & Exchange Commission	Filing Fees	250.00
06/17/88	Wilson Gill, Inc.	Supplies	90.00
		TOTAL	\$ 77,894.26

Asociacion Colombiana de Exportadores de Flores (Asocolflores)

Various	Xerox Corporation	Duplicating	\$ 3,783.84
08/31/88	U.S. Department of Commerce	Duplicating	68.65
07/05/88	Baumgarten Co. of Washington	Supplies	19.88
Various	C & P Telephone	Telephone	2,079.10
Various	U.S. Postal Service	Postage	222.20
Various	A & P Employees	Local Transportation	372.71
Various	A & P Employees	Cash Expenses	520.80
Various	Lexis	Computer Research	1,798.40
Various	Westlaw	Computer Research	151.20
Various	A & P Attorneys	Travel Expense (Conf. with client)	6,296.68
Various	Federal Express	Courier	198.45
06/27/88	DHL Airways	Courier	46.00
Various	Falcon Express	Courier	1,301.53
Various	Downtown Courier	Courier	51.45
Various	Western Union Int'l Inc.	Telex	43.53
Various	RCA Global Communications	Telex	16.15
08/31/88	Superintendent of Documents	Publications	61.00
10/31/88	Invictus Publishing Corp.	Publications	25.00
10/03/88	Monitoring Publishing Company	Publications	129.32

Disbursements (Cont.)

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Asociacion Colombiana de Exportadores de Flores (Asocolflores) (cont.)</u>			
10/31/88	Secretary of State, State of Texas	Filing Fees	\$ 25.00
09/20/88	Research Information Service	Document Retrieval	76.32
Various	APCO Associates	Professional Service fees (Preparation of report)	11,579.37
09/29/88	Shane Hunt	Professional Service fees	1,196.77
07/27/88	Trade Resources Company	Professional Service fees (in connection with antidumping investigation)	3,108.35
08/22/88	CT Corporation System	Professional Service fees (Assistance with out-of-state incorporation)	449.00
		TOTAL	\$ 33,620.70

Airbus Industrie

Various	Xerox Corporation	Duplicating	\$ 785.74
07/20/88	American Blueprinting Corp.	Duplicating	10.87
06/08/88	Harbridge House, Inc.	Duplicating	50.00
Various	C & P Telephone	Telephone	266.29
Various	U.S. Postal Service	Postage	2.65
Various	A & P Employees	Local Transportation	113.84
Various	A & P Employees	Cash Expenses	108.52
Various	A & P Attorneys	Travel Expenses (Conf. with client)	2,486.27
Various	Federal Express	Courier	118.20
Various	Downtown Courier	Courier	25.15
Various	Booklink Corporation	Publications	63.15
06/17/88	Nat'l Technological Info. Service	Publications	34.95
08/31/88	Superintendent of Documents	Publications	29.00
08/25/88	Euromoney Publications	Publications	148.40
Various	Trade Resources Company	Professional Service fees	585.00
08/31/88	Barnes, Richardson & Colburn	Professional Service fees	2,168.06
		TOTAL	\$ 6,996.06

Inter-American Development Bank (IDB)

Various	Xerox Corporation	Duplicating	\$ 55.85
Various	C & P Telephone	Telephone	13.59
Various	A & P Employees	Local Transportation	10.05
Various	A & P Employees	Cash Expenses	11.00
09/20/88	Falcon Express	Courier	8.00
		TOTAL	\$ 98.49

ATTACHMENT NO. 11

15(c). Disbursements-Political Contributions

During this 6-month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things or value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

☐ Yes ☒ No<sup>\*/</sup>

<sup>\*/</sup> However, the following persons who have filed Short-Form Registration Statements have made political contributions in connection with elections for federal offices:

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<u>NANCY ABRAMOWITZ</u>			
6/13/88	\$ 115.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 115.00	Arnold & Porter Partners PAC	Various
10/6/88	\$ 250.00	Victory Fund '88	Various
<u>WILLIAM BAER</u>			
6/13/88	\$ 115.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 115.00	Arnold & Porter Partners PAC	Various
10/3/88	\$ 500.00	Dukakis for President	Michael Dukakis
11/3/88	\$ 150.00	Franchot for Congress	Peter Franchot
7/10/88	\$ 150.00	Williams for Congress	Lon Williams
<u>PAUL BERGER</u>			
6/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
7/12/88	\$ 500.00	Ed Garvey for Senate	Ed Garvey
7/29/88	\$ 250.00	Friends of Cong. Tom Lantos	Tom Lantos
8/30/88	\$ 250.00	Bob Weinberg for Congress	Bob Weinberg
9/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
9/29/88	\$ 50.00	Garvey for U.S. Senate	Ed Garvey
11/2/88	\$ 500.00	Democrats for the 80's	Various

PETER BLEAKLEY

6/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
6/28/88	\$ 250.00	Dukakis for President	Michael Dukakis
7/11/88	\$ 50.00	Williams for Congress	Lon Williams
9/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
9/21/88	\$ 50.00	Democratic Congressional	Various
11/2/88	\$ 250.00	Democrats for the Eighties Campaign Committee	Various

MARIAN BLOCK

7/12/88	\$ 25.00	Democratic National Committee	Various
9/4/88	\$ 50.00	Democratic National Committee	Various
10/15/88	\$ 100.00	Democratic National Committee	Various
8/18/88	\$ 50.00	Evan Bayh for Governor	Evan Bayh
10/15/88	\$ 75.00	Evan Bayh for Governor	Evan Bayh

BROOKSLEY BORN

6/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 100.00	Bob Weinberg for Congress	Bob Weinberg
11/3/88	\$ 100.00	Franchot for Congress	Peter Franchot

EDWARD BRENNER

2/3/88	\$ 250.00	Dole for President	Robert Dole
3/31/88	\$ 250.00	Gore for President	Albert Gore
10/28/88	\$ 500.00	Frank Lautenberg	Frank Lautenberg

HOWARD CAYNE

6/13/88	\$ 93.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 93.00	Arnold & Porter Partners PAC	Various

LYNDA CLARIZIO

10/1/88	\$ 25.00	Wolpe for Congress	Howard Wolpe
10/26/88	\$ 100.00	Bill Bradley for U.S. Senate	Bill Bradley

WHITNEY DEBEVOISE

6/13/88	\$ 93.25	Arnold & Porter Partners PAC	Various
9/13/88	\$ 93.25	Arnold & Porter Partners PAC	Various



PATRICIA DILLEY

8/88	\$ 250.00	Victory Fund '88	Various
9/17/88	\$ 150.00	Victory Fund '88	Various
10/25/88	\$ 50.00	Hispanics for Good Government	Various

JAMES DOBKIN

6/13/88	\$ 225.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 225.00	Arnold & Porter Partners PAC	Various

A. PATRICK DOYLE

6/13/88	\$ 125.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 125.00	Arnold & Porter Partners PAC	Various

DOUGLAS DWORKIN

6/13/88	\$ 105.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 105.00	Arnold & Porter Partners PAC	Various

THOMAS DWYER

8/18/88	\$ 200.00	Republican Party of Virginia	Various
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DANIEL ESTY

7/20/88	\$ 50.00	Victory Fund '88	Michael Dukakis
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JAMES FITZPATRICK

6/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
6/14/88	\$1,000.00	Compliance Fund	Michael Dukakis
9/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
11/3/88	\$ 500.00	Democrats for the 80's	Various

SAMUEL FLAX

9/15/88	\$ 75.00	Democratic National Committee	Various
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MELVIN GARBOW

6/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various

ALAN GOODMAN

10/19/88	\$ 100.00	Michael Dukakis	Michael Dukakis
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DAVID GREENBERG

9/20/88	\$ 100.00	Committee for Democratic Opportunity	William H. Gray
12/1/88	\$ 100.00	Gephardt for President Committee	Richard Gephardt

JOSEPH GUTTENTAG

6/23/88	\$ 250.00	Levin for Congress Committee	Sander Levin
6/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
10/2/88	\$ 400.00	Dukakis Campaign	Michael Dukakis
10/24/88	\$ 50.00	Conway for Congress	Jack Conway

KENNETH HANDAL

11/2/88	\$ 500.00	Bush-Quayle'88 Compliance Committee	Bush-Quayle
11/22/88	\$ 50.00	1988 Presidential Fund	George Bush

RICHARD HUBBARD

6/13/88	\$ 200.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 200.00	Arnold & Porter Partners PAC	Various
6/17/88	\$ 30.00	D.C. Dollars for Democrats	Various

JOHN H. JACKSON

8/3/88	\$ 100.00	Democratic National Committee	Various
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ROBERT J. JONES

6/13/88	\$ 200.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 200.00	Arnold & Porter Partners PAC	Various

KENNETH JUSTER

6/13/88	\$ 93.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 93.00	Arnold & Porter Partners PAC	Various

HADRIAN KATZ

6/13/88	\$ 115.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 115.00	Arnold & Porter Partners PAC	Various
9/19/88	\$ 100.00	Democratic National Committee Federal Account	Various

ABE KRASH

6/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
10/3/88	\$1,000.00	Democratic National Committee Federal Account	Various
10/12/88	\$ 500.00	Committee for Democratic Opportunity	William H. Gray

KENNETH LETZLER

6/13/88	\$ 187.50	Arnold & Porter Partners PAC	Various
9/13/88	\$ 187.50	Arnold & Porter Partners PAC	Various

HAROLD LUKS

6/23/88	\$ 100.00	Dukakis Compliance Fund	Michael Dukakis
10/3/88	\$ 150.00	Democratic National Committee	Various
8/4/88	\$ 100.00	Don Bonker for Senate	Don Bonker

PATRICK MACRORY

6/13/88	\$ 200.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 200.00	Arnold & Porter Partners PAC	Various

ROBERT MANNION

6/13/88	\$ 115.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 115.00	Arnold & Porter Partners PAC	Various

MICHAEL MIERZEWSKI

6/13/88	\$ 93.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 93.00	Arnold & Porter Partners PAC	Various

NANCY MINTZ

6/13/88	\$ 150.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 150.00	Arnold & Porter Partners PAC	Various

BRUCE MONTGOMERY

6/13/88	\$ 225.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 225.00	Arnold & Porter Partners PAC	Various
10/88	\$ 500.00	Dukakis for President	Michael Dukakis

GWYN MURRAY

9/29/88	\$ 25.00	Democratic National Committee	Various
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RICHARD E. NEFF

6/88	\$ 35.00	Peter Franchot	Peter Franchot
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G. PHILIP NOWAK

12/11/87	\$1,000.00	Prof. & Bus. Forum (Democratic Congressional Campaign Committee)	Various
12/11/87	350.00	Vic Fazio	Vic Fazio
2/18/88	250.00	Robert Dole	Robert Dole

CLAIRE READE

6/13/88	\$ 81.67	Arnold & Porter Partners PAC	Various
9/13/88	\$ 81.67	Arnold & Porter Partners PAC	Various

ANDRE REIMAN

6/13/88	\$ 105.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 105.00	Arnold & Porter Partners PAC	Various

DANIEL REZNECK

6/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various

WILLIAM ROGERS

6/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
6/16/88	\$ 500.00	Committee to Re-Elect Tom Foley	Tom Foley
9/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
11/3/88	\$ 500.00	Democrats for the Eighties	Various

ROBERT D. ROSENBAUM

9/13/88	\$ 300.00	Arnold & Porter Partners PAC	Various
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STANFORD ROSS

6/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various
6/5/88	\$1,000.00	Dukakis Compliance Fund	Michael Dukakis
9/30/88	\$1,000.00	Democratic National Committee Victory Fund	Various
9/13/88	\$ 250.00	Arnold & Porter Partners PAC	Various

RICHARD SCHIFTER

6/13/88	\$ 93.25	Arnold & Porter Partners PAC	Various
9/13/88	\$ 93.25	Arnold & Porter Partners PAC	Various

LAWRENCE A. SCHNEIDER

6/13/88	\$ 125.00	Arnold & Porter Partners PAC	Various
6/20/88	\$ 100.00	David Price for Congress Committee	David Price
9/13/88	\$ 100.00	Bob Weinberg for Congress	Bob Weinberg
9/13/88	\$ 100.00	Price for Congress Committee	David Price
9/13/88	\$ 125.00	Arnold & Porter Partners PAC	Various
10/29/88	\$ 150.00	David Price for Congress Committee	David Price

SCOTT SCHREIBER

6/13/88	\$ 125.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 125.00	Arnold & Porter Partners PAC	Various

NORMAN SINEL

6/13/88	\$ 200.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 200.00	Arnold & Porter Partners PAC	Various

MARK STUMPF

6/13/88	\$ 150.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 150.00	Arnold & Porter Partners PAC	Various

STEVEN G. TEPPER

6/13/88	\$ 62.50	Arnold & Porter Partners PAC	Various
9/13/88	\$ 62.50	Arnold & Porter Partners PAC	Various

DANIEL WALDMAN

6/13/88	\$ 93.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 93.00	Arnold & Porter Partners PAC	Various

KATHLEEN WALLMAN

9/25/88	\$ 75.00	Victory '88 Fund	Michael Dukakis
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THOMAS WILNER

8/25/88	\$ 200.00	Joe Lieberman for U.S. Senate	Joe Lieberman
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ROBERT WINTER

6/13/88	\$ 225.00	Arnold & Porter Partners PAC	Various
9/13/88	\$ 225.00	Arnold & Porter Partners PAC	Various

UNITED STATES DEPARTMENT OF JUSTICE  
REGISTRATION UNIT  
CRIMINAL DIVISION  
WASHINGTON, D. C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes \_\_\_\_\_ or No X \_\_\_\_\_

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes X \*/ \_\_\_\_\_ or No \_\_\_\_\_

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Robert E. Herzstein  
Signature

January 25, 1989  
Date

Robert E. Herzstein  
Please type or print name of  
signatory on the line above

Partner

Title

- \*/ Attached is a copy of a July 8, 1988 letter. During the six-month period ended December 4, 1988, Registrant did not disseminate any other material (except material filed in the course of litigation or established agency proceedings)